

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:)	CHAPTER 11
)	
DELPHI, INC., et al.)	CASE NO. 05-44481 (RDD)
)	
Debtor.)	(Jointly Administered)

**MOTION FOR PAYMENT OF ADMINISTRATIVE
CLAIM/TAXES INCURRED POST-PETITION**

MADISON COUNTY (INDIANA) TREASURER, by counsel, THOMAS M. BEEMAN,
moves the Court for payment of administrative claims and states the following:

1. Debtors filed their voluntary petitions under Chapter 11 on October 8, 2005 and October 14, 2005 for reorganization relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1330. The Debtors continue to operate their business and manage their properties as Debtors-in-possession under the Bankruptcy Code.

2. Debtors, DELPHI AUTOMOTIVE SYSTEMS, LLC, incurred on March 1, 2006, personal property taxes for 2006 taxes due in 2007 to the MADISON COUNTY (INDIANA) TREASURER due December 10, 2007, in the total amount of Eight Hundred Eighty-Eight Thousand Eight Hundred Ninety-Two Dollars and Sixteen Cents (\$888,892.16). A true copy of the personal property tax bills for the Debtors are attached hereto.

3. Tax rates for taxes accruing in 2006 payable in 2007 were not calculated by the State of Indiana in a timely fashion and the due date of December 20, 2007 is later than the normal due dates of May and November.

4. Debtors, DELPHI AUTOMOTIVE SYSTEMS, LLC, incurred on March 1, 2007 personal property taxes for 2007 payable in 2008 to the MADISON COUNTY (INDIANA)

TREASURER which will be due and payable in two (2) equal installments in May and November, 2008 in the total amount of Six Hundred Nineteen Thousand Four Hundred Eighty-Eight Dollars and Seventy-Six Cents (\$619,488.76). This amount is estimated based on 2006 payable 2007 tax rates since 2007 payable 2008 rates have not been established.

5. The claim is not subject to any setoff or counterclaim, and claimant holds no security for said debt.

6. Claimant is entitled to payment of this administrative claim under 11 U.S.C. §503 (b) plus any penalties or interest owed on said claim.

WHEREFORE, Claimant prays for an order of this Court directing payment of administrative expenses in the amount of Eight Hundred Eighty-Eight Thousand Eight Hundred Ninety-Two Dollars and Sixteen Cents (\$888,892.16) for 2006 taxes payable on December 10, 2007 and Six Hundred Nineteen Thousand Four Hundred Eighty-Eight Dollars and Seventy-Six Cents (\$619,488.76) for 2007 taxes payable in 2008 and all other just and proper relief.

/s/ Thomas M. Beeman
Thomas M. Beeman, #4291-45
Attorney for Creditor
Madison County (Indiana) Treasurer
33 West 10th Street, Suite 200
Anderson, Indiana 46016
Telephone: 765/640-1330
Fax: 765/640-1332

CERTIFICATE OF SERVICE

The undersigned certifies and affirms that on December ____, 2007, he electronically filed with the clerk of the Court a copy of the Motion for Payment of Administrative Claim/Taxes Incurred Post-Petition on behalf of Creditor MADISON COUNTY (INDIANA) TREASURER ("Motion") using the ECF system, which system will send an electronic copy of same to those ECF participants registered in the above-referenced matter.

The undersigned also certifies and affirms that a copy of the Motion was also mailed by regular U.S. mail, postage pre-paid, to the following at their business address set forth below in accordance with the Court's Notice of Procedures:

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Delphi Automotive Systems, LLC
5725 Delphi Drive
Troy, MI 48098
Attn: Legal Staff | 2. Delphi Corporation
5725 Delphi Drive
Troy, MI 48098
Attn: General Counsel |
| 3. Counsel to Debtors
Skadden, Arps, Slate,
Meagher & Flom, LLP
333 West Wacker Drive
Suite 2100
Chicago, IL 60606 | 4. Counsel for the Agent under
the Post-Petition Credit Facility
Davis Polk & Wardwell
450 Lexington Avenue
New York, NY 10017
Attn: Donald Bernstein
and Brian Resnick |
| 5. Counsel for the Official Committee
of Unsecured Creditors
Latham & Watkins, LLP
885 Third Avenue
New York, NY 10022
Attn: Robert Rosenberg and Mark Broude | 6. Counsel for the Official Committee
of Equity Security Holders
Fried, Frank, Harris, Shriver &
Jacobson, LLP
One New York Plaza
New York, NY 10004
Attn: Bonnie Steingart |
| 7. Office of the U.S. Trustee
Southern District of New York
33 Whitehall Street, Suite 2100
New York, NY 10004
Attn: Alicia M. Leonhard | 8. The Honorable Robert D. Drain
U.S. Bankruptcy Judge
U.S. Bankruptcy Court
Southern District of New York
One Bowling Green, Room 632
New York, NY 10004 |
| 9. E. Todd Sable
Seth A. Drucker
2290 First National Building
660 Woodward Ave., Suite 2290
Detroit, MI 48226-3506 | |

/s/ Thomas M. Beeman

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